

2.2.6. *Exception Handling.* The BPT must handle transaction fallout in a predictable and efficient manner so that exceptions get resolved as quickly as possible. Where necessary, the BPT will notify human operators of particular exceptions that require their attention.

2.2.7. *Security.* The BPT is responsible for access authorization, transaction logging and alerting management to access violations.

2.3. OSS Access Tier

The OAT is responsible for providing a set of access methods to the Operation Support Systems. The essential modules found in the OAT are:

2.3.1. *Data Access Module/Objects.* These are the functional modules/objects that know how to access the OSS's for the execution of transactions or commands. Possible access methods range from screen-scraping to MQ Series to previously-built customized access software (e.g., Data Arbiter, MEDIACC, etc.). These modules are also responsible for routing the request to the appropriate copy of the selected OSS. Where more than one copy of a particular OSS is used by USWC, this layer will check the contents of the user's request to decide which copy contains the proper data to service the request (i.e., different states within the USWC region are typically supported on different copies of an OSS).

2.3.2. *Flow Control and Queuing.* The OAT works in cooperation with the BPT to make sure the back-end systems are not overloaded—and that transactions proceed at the fastest possible rate. Where the OSS is not capable of providing appropriate levels of flow control to the OAT, the OAT may need to spool output received from the OSS and/or return an exception to the BPT.

2.3.3. *Transaction Management.* The OAT is responsible for flowing transactions to the back-end systems and providing the expected response (or exception) to the BPT. The OAT is also responsible for mapping responses to requests so that the BPT can determine with which transaction the output is associated. In the case of an exception, the BPT will decide how to handle it.

2.3.4. *Security.* The OAT only allows authorized BPT processes to call the services it provides. The OAT complies with the security measures already in place for the OSSs. The OAT maps specific user data and transaction requests with those that have been approved. Users requesting data they are not authorized to have or transactions they are not authorized to execute, will be notified via an exception to the BPT.

3. Requirements

This section describes the detailed requirements for the interface gateway. These are provided to give an overview of the total set of software capabilities that must be considered in developing an interface to USWC's OSS's. Some of the requirements described below which do not affect the external view of the OSS interface gateway as seen by CLECs will not be met with the first release of the interface, but will be delivered in subsequent phases to enhance its supportability and maintainability.

3.1. Application Protocols

3.1.1. Shall utilize HTTP for CLEC access to USWC OSSs.

3.2. Transaction Spooling

3.2.1. Shall provide a queue for storage of incoming transactions.

3.2.2. Shall provide a queue for storage of transaction responses.

3.2.3. For synchronous transactions that cannot be processed, shall notify the user indicating that the requested OSS is not available for processing at this time and to try again later.

3.2.4. Shall support the batching of asynchronous transaction.

3.2.5. Shall support a persistent state for all transactions.

3.3. Lexical Rules Management

3.3.1. Shall support the creating, updating and deleting of lexical rules for each transaction.

3.3.2. Shall perform transaction specific lexical rule evaluation.

3.3.3. Shall identify and record lexical errors by transaction for each user.

3.3.4. Shall notify the user of lexical errors in real time.

3.3.5. Shall provide an inquiry facility for users to request information regarding transactions that erred out.

3.4. Session Management

3.4.1. Shall support the creation and destruction of a user session.

3.4.2. Shall provide services to maintain context throughout a users session.

3.4.3. Shall support the auditing of customer usage by session.

3.4.4. Shall support status operations for all transactions in progress.

3.5. Semantic Rules Management

3.5.1. Shall support the creating, updating and deleting of business rules for each transaction.

3.5.2. Shall perform transaction specific business rule evaluation.

3.5.3. Shall identify and record semantic errors by transaction for each user.

3.5.4. Shall notify the user of semantic errors in real time.

3.5.5. Shall notify the application administrator of semantic errors in real time.

3.5.6. Shall provide an inquiry facility for users and administrators to request information regarding transactions that erred out.

3.6. Flow Control and Queuing

3.6.1. Shall provide the facility to capture metrics associated with Operation Support System throughput, load and response time on a real time basis.

3.6.2. Shall provide the facility to create, update and delete Operation Support System throughput, load and response time thresholds.

3.6.3. Shall provide the facility to create, update and delete rules for managing threshold overload conditions.

3.6.4. Shall monitor Operation Support System loads thresholds on a real time basis.

3.6.5. Shall manage Operation Support System threshold overload conditions by balancing transaction workloads and deferring transactions according to user specified rules.

3.7. Reliability, Availability, Serviceability

3.7.1. Shall monitor and report on mean time between failures by application component (i.e., Session Management, Transaction Spooling, etc.).

3.7.2. Shall monitor and report on mean time between failures by infrastructure component (i.e., EIT hardware, EIT Operating System, BPT hardware, network, etc.)

3.7.3. Shall monitor and report on mean time to repair by application component (i.e., Session Management, Transaction Spooling, etc.).

3.7.4. Shall monitor and report on mean time to repair by infrastructure component (i.e., EIT hardware, EIT Operating System, BPT hardware, network, etc.)

3.7.5. The proposed solution shall be available 24 hours a day, 7 days a week, 365 days a year with less than a 2 hour maintenance window once a week.

3.7.6. Whenever possible, application and infrastructure components shall be updateable without side effects. Meaning that when one component is undergoing preventative maintenance or configuration changes, its state adversely effects the smallest number of related components.

3.7.7. Shall support the deferred processing of asynchronous transactions.

3.7.8. Shall notify users of the success or failure of all transactions.

3.8. Performance (each server)

3.8.1. Shall support 1,000 logged in (e.g., defined) users by the first half of 1997.

3.8.2. Shall support 200 concurrent users by the first half of 1997.

3.8.3. Shall support incremental scalability improvements.

3.9. Accounting

3.9.1. Shall provide a facility to gather session and transaction accounting metrics.

3.9.2. Shall provide a system for charge back of resources consumed by user and by company.

3.9.3. Shall provide the ability to modify the level of accounting as required without restarting the application (i.e., change aggregation or disaggregation levels).

3.10. Security

3.10.1. Shall support the unique identification of potential application users.

3.10.2. Shall support the authentication of potential application users.

3.10.3. As part of the authentication process, shall ensure the integrity of all data elements accessed. No Access, Read Only or Read/Write data access restrictions are to be enforced.

3.10.4. Shall support CPNI data access restrictions.

3.10.5. Shall secure access to transactions by user and by company.

3.10.6. Shall secure access to any facility and customer data by user and by company.

3.10.7. Shall provide a facility for auditing user sessions and transactions.

3.11. Transaction Management

3.11.1. Shall support the creation of unique transaction identifiers.

3.11.2. Shall manage transaction commit, roll back and roll forward.

3.11.3. Shall support the auditing of customer usage by transaction.

3.12. Fault

3.12.1. Shall support Infrastructure (e.g., BroadVision, Netscape, etc.) Exception Handling; alarming to USWC's Operations Center management platform for Server faults.

3.12.2. Shall support Application Exception Handling; alarming to U S WEST's Operations Center management platform for all components (i.e., Transaction Spooling, Session Management, etc.) of the Mediated Access application.

3.12.3. Shall record interim status (when appropriate) and the final status (e.g., Completed, Failed) for every transaction executed.

3.12.4. Shall support the generation of System Status Bulletins.

3.13. Operability/Manageability

3.13.1. Systems Administrators shall be able to start up, shut down and query status for each Infrastructure component.

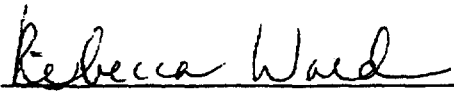
3.13.2. Application Administrators shall be able to start up, shutdown and query status for each Application component.

3.14. Configuration

3.14.1. Component changes shall be implemented in an automated fashion remotely *via* HP's Software Distributor.

CERTIFICATE OF SERVICE

I, Rebecca Ward, do hereby certify that on this 11th day of December, 1996, I have caused a copy of the foregoing **PETITION FOR WAIVER** to be served via hand-delivery upon the persons listed on the attached service list.


Rebecca Ward

0001

1 BEFORE THE PUBLIC UTILITIES COMMISSION

2 IN AND FOR THE STATE OF CALIFORNIA

3 --- o0o ---

4 MCI TELECOMMUNICATIONS CORPORATION,

Complainant,

5 vs. NO. 96-12-026

PACIFIC BELL AND PACIFIC BELL COMMUNICATIONS,

6 Defendants.

7

8 AT&T COMMUNICATIONS OF CALIFORNIA, INC.

Complainant,

9 vs. NO. 96-12-044

PACIFIC BELL,

10 Defendant.

11 -----//

12

13

14 DEPOSITION OF JAIME VILLAGOMEZ

15 April 15, 1997

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17

18 REPORTED BY:

SANDRA L. CARRANZA, CSR NO. 7062, RPR

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0002

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0003

1 APPEARANCES

2

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0004

1 BE IT REMEMBERED THAT, pursuant to
2 Notice of Taking Deposition and on Tuesday, April 15,
3 1997, commencing at the hour of 9:00 a.m., before me,
4 SANDRA L. CARRANZA, CSR NO. 7062, RPR, there personally
5 appeared

6

7 JAIME VILLAGOMEZ,

8

9 called as a witness by the Complainants, who, having been

10 first duly sworn, was examined and testified as

11 hereinafter set forth.

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0005

1 JAIME VILLAGOMEZ

2 having been duly sworn, testified as follows:

3

4 EXAMINATION BY MR. McDONALD

5 MR. McDONALD: Q. Can you please state your

6 name.

7 A. Jaime Villagomez.

8 Q. By whom are you employed?

9 A. Pacific Bell.

10 Q. Where are you employed?

11 A. In San Francisco, at 370 Third Street.

12 Q. Mr. Villagomez, my name is Tom McDonald, and I
13 represent MCI in this matter. There will be another
14 lawyer who will be joining us a little bit later. He had
15 another commitment this morning. His name is William
16 Ettinger. He represents AT&T.

17 And in this deposition, I will be asking you
18 some questions. When I conclude, Mr. Ettinger may have
19 additional questions that he may have for you. In
20 addition, your own counsel may have some questions he may
21 pose to you.

22 In the course of the deposition, it will be
23 necessary for you to listen to the question and wait for
24 the question to be completed, and then provide an oral
25 answer rather than simply a nod or a gesture. Do you
0006
1 understand?

2 A. Yes.

3 Q. Have you ever been deposed before?

4 A. No.

5 Q. Have you ever given testimony before in any kind
6 of formal proceeding?

7 A. No.

8 Q. Now, prior to coming to your deposition here
9 today, have you spoken with anyone about your deposition,
10 besides Mr. Kolto-Wininger?

11 A. Yes.

12 Q. With whom have you spoken?

13 A. I have exchanged voice mail with Jerry Sinn.

14 Q. And when did that occur?

15 A. That occurred yesterday.

16 Q. What was the nature of the message that -- you
17 conveyed the message to Mr. Sinn and also received a
18 message?

19 A. Yes.

20 Q. Can you explain to me the substance of what was
21 conveyed?

22 A. I just asked Jerry Sinn if -- more in terms of
23 expectation, and he just said to be, you know, relaxed, if
24 you tell -- same thing he had told me. Tell what you
25 know. If you don't know, don't speculate.

0007

1 Q. Did you examine any documents prior to coming to
2 the deposition today?

3 A. Yes.

4 Q. And can you tell me what document you examined?

5 A. The document that I examined just was our
6 most -- our recent outlook that was prepared in the last
7 week on our financials for the unit, including local
8 competition.

9 I also examined -- actually, it wasn't an
10 examination, but it was more kind of a verbal -- included
11 in that is a verbal discussion with the individual on my
12 staff that's been involved in local competition, and
13 that's Robert Hough.

14 So I was just trying to -- it's been some period
15 of time since we have dealt with this issue, and so I

16 wanted to be knowledgeable, as much as I could.

17 Q. Sure. Did you, at any time, see a document, and
18 I will show you what's been marked Exhibit 10, the title
19 of the document is, "Notice of deposition," of the person
20 most qualified to testify about resale order volume
21 forecasts and specification of documents to be produced at
22 deposition?

23 A. No. I also reviewed the testimony of Jerry
24 Sinn.

25 Q. Okay. The transcript?
0008

1 A. Yes.

2 Q. The two volumes of it?

3 A. Yes.

4 Q. When did you examine that?

5 A. Over the weekend.

6 Q. Was there anything else that you looked at?

7 A. Let's see, what else was included? I also, but
8 not in detail, looked at Laura Schwartz' general
9 testimony, but I kind of ran short on time a little bit
10 there, but basically the financials, the voice mail with
11 Jerry, the testimony, and my discussions with Robert
12 Hough.

13 Q. Can you tell me what your current title is?

14 A. It's finance director, industry markets group.

15 Q. How long have you held that position?

16 A. A little over two years.

17 Q. What are your duties in that position?

18 A. Basically, it categorizes financial management,
19 which is the finances of the organization.

20 Q. Do you set budgets for the entire organization?

21 A. Yes.

22 Q. What else do you do? Do you determine sources
23 of revenue --

24 A. Yes.

25 Q. -- for the organization?
0009

1 A. Sources, I have a revenue side of the unit,
2 expense, capital, and force or people.

3 MR. KOLTO-WININGER: You will need to let him
4 finish his question. He was finishing up and then you
5 start --

6 THE WITNESS: I'm sorry.

7 MR. KOLTO-WININGER: That's all right.

8 MR. McDONALD: Q. And you said you've held that
9 position for two years?

10 A. A little over two years.

11 Q. So you commenced that position early 1995?

12 A. Let's see, yes.

13 Q. How long have you been employed with Pacific
14 Bell?

15 A. 11 years, a little over 11.

16 Q. So prior to taking the position as finance
17 director of the industry markets group, what position did
18 you hold?

19 A. I had a similar position in the public sector
20 business unit.

21 Q. And the primary difference between those two
22 positions, in the public sector business unit the
23 customers were state agencies and the like?

24 A. Correct.

25 Q. Whereas now, in the industry markets group, your
0010 1 customers are other telecommunications carriers?

2 A. Correct. Also the size, the size of
3 responsibility.

4 Q. And how would you distinguish the size?

5 A. On the revenue side, multiples, larger. The
6 public sector is a smaller revenue unit, smaller expense
7 unit.

8 Q. How long did you hold that position in the
9 public sector unit?

10 A. Approximately a year-and-a-half.

11 Q. So then prior to that, what was your position?

12 A. My position was director, involved in business
13 planning for the company.

14 Q. Were you in a group or a unit or some division?

15 A. Yes. It was in the CFO, under the CFO
16 department, Chief Financial Officer.

17 Q. How long did you hold that position?

18 A. Approximately a year-and-a-half.

19 Q. Did you have an area of responsibility as a
20 director for business planning under the CFO?

21 A. Yes. And that's business planning.

22 Q. What did that entail?

23 A. It's generally managing the process behind

24 planning of plans and financials for the company.

25 Q. Is that for the entire Pacific Bell enterprise?

0011

1 A. Yes.

2 Q. So it wasn't specific to particular markets?

3 A. No.

4 Q. So I think you have told us -- that's about five

5 years' worth of experience. For the prior six years, what

6 positions did you hold?

7 A. A variety of positions in marketing and sales.

8 Q. Was there an emphasis in any particular unit or

9 discipline within Pacific Bell?

10 A. Do you mean in terms of function?

11 Q. Right.

12 A. I would say more planning and market analysis.

13 Q. Did those positions involve planning with

14 respect to establishing, you know, force estimates, number

15 of personnel that would be needed to perform tasks, that

16 kind of thing?

17 A. In at least one job in that five years.

18 Q. How about in the -- as a director of business

19 planning, was that something that you did?

20 A. No. It was more the process of gathering

21 information, the plans, so it was more of a kind of a

22 process or orientation. There was another individual that

23 was responsible for the numbers, the financials.

24 MR. McDONALD: Mr. Ettinger is now joining us.

25 Let's go off the record for a second.

0012

1 (Discussion off the record.)

2 MR. McDONALD: Back on the record.

3 Q. How about when you were -- was it financial
4 director of the public sector?

5 A. Yes.

6 Q. Did you have planning responsibilities there?

7 A. Yes.

8 Q. And what did that involve?

9 A. It involved revenue expense force.

10 Q. And prior to your employment with Pacific Bell,
11 is my math -- you have been there since about 1986 or
12 thereabouts?

13 A. Yes.

14 Q. Prior to that time, did you have full-time
15 employment?

16 A. No.

17 Q. What level of educational degree --

18 A. Master's in business.

19 MR. KOLTO-WININGER: You will need to let him
20 finish the question, just so that she doesn't get
21 frustrated over there.

22 MR. McDONALD: Q. And where did you obtain your
23 Master's in business degree?

24 A. University of Pennsylvania.

25 Q. You have an undergraduate degree as well?

0013

1 A. Yes.

2 Q. Where is that from?

3 A. That's from Stanford.

4 Q. In what discipline?

5 A. Engineering.

6 Q. What kind of engineering?

7 A. Electrical.

8 Q. Did you go directly from your undergraduate

9 to -- business undergraduate education to business school?

10 A. No.

11 Q. So in between completion of your undergraduate

12 education and business school, did you have some other

13 employment?

14 A. Yes.

15 Q. What was that?

16 A. I worked for Bechtel.

17 Q. For how long did you do that?

18 A. Two years.

19 Q. Did you work as an engineer for Bechtel?

20 A. Yes.

21 Q. In your current position, who do you report to?

22 A. I report to Elizabeth Fetter.

23 Q. And in the two years that you have been the

24 finance director, has that changed?

25 A. No.

0014

1 Q. Did Ms. Fetter hire you?

2 A. Yes.

3 Q. And who reports to you?

4 A. By name or --

5 Q. How many people report to you, let's start that

6 way?

7 A. In the organization, there's about a little over

8 20.

9 Q. Are they given designations as certain level

10 managers, or something like that, or directors?

11 A. Yes.

12 Q. They are all directors?

13 A. No.

14 Q. Do you have a general breakdown as to what your

15 subordinates -- what titles they hold?

16 A. Yes. I have one director, a series of analysts,

17 first level managers, staff associate, data

18 administrators, main functions.

19 Q. So they all report either directly or indirectly

20 to you?

21 A. Yes.

22 Q. How many people directly report to you?

23 A. Approximately 10.

24 Q. Is Robert Hough one of the people that report

25 directly to you?

0015

1 A. Yes.

2 Q. What's his title?

3 A. His title is financial manager.

4 Q. Does he have any specific tasks, any areas of

5 responsibility that are entrusted to him?

6 A. Yes. Local competition analysis.

7 Q. So that would include resale; is that right?

8 A. Yes.

9 Q. And it would include things beyond resale as
10 well?

11 A. Yes.

12 Q. When did you first become involved with
13 Pacific's resale efforts?

14 A. In what capacity? My capacity, just general?

15 Q. Yes. You understand when I talk about the
16 resale, I am talking about resold local exchange services?

17 A. Yes.

18 Q. At some point, I assume you didn't -- I
19 shouldn't assume anything, I guess.

20 In your career at Pacific, have you been
21 involved in the resale of local exchange services?

22 A. Yes.

23 Q. When did you first become involved in that?

24 A. I would say towards the tail-end of 1995.

25 Q. So that was after you had become the finance
0016
1 director of the industry markets group?

2 A. Yes.

3 Q. And how did you become involved in the resale
4 business?

5 A. It was an element of the organization, and so
6 basically at that point, what I was trying to do was just
7 get general information about what, you know, what were
8 people doing, any things that I needed to worry about in
9 terms of my area of responsibility at that point.

10 Q. How did you acquaint yourself with the resale

11 business?

12 A. Through discussions with those people that were
13 responsible, mainly the Jerry Sinn type individuals
14 through -- and through Robert Hough.

15 Q. What was your responsibility with respect to the
16 resale business?

17 A. Again, mainly per my area of responsibility, and
18 that was just to understand what was going on, understand
19 if it was going to have any direct bearings on work that
20 we were doing for planning the budget for 1996, any people
21 that I needed to be working with, that kind of thing.

22 Q. Well, when you were planning the budget for the
23 industry markets group, what information did you determine
24 that you needed, with respect to the resale business?

25 A. What period of time?
0017

1 Q. I think you told us in late 1995 -- is that when
2 you were doing planning for the 1996 year?

3 A. But not for this. It was -- it was not a part
4 of our direct requirements because it was in the planning
5 mode, so the resource levels were not, at that point --

6 Q. Let me make sure I understand. Because resale
7 was in the planning stage, you weren't required to
8 include, as part of your budget plan --

9 A. Me personally, my group personally.

10 Q. Let me try to finish the question and then you
11 can give me your answer.

12 Okay. So you are telling me about yourself

13 personally. In late 1995 -- let me understand it, see if
14 I understand it correctly. Late 1995, you were involved
15 in budget planning for 1996; is that right?

16 A. That's correct.

17 Q. And in connection with that, you became familiar
18 with the resale business?

19 A. That's correct.

20 Q. But because the resale business was still at the
21 planning stage, you didn't need to know about it in
22 detail?

23 A. Lesley Wood and her team were the ones that
24 were -- and I am going from recollection, from memory,
25 were the teams that were involved in assessing the
0018
1 requirements for the different things. And so they were
2 working within their infrastructure of folks to be able to
3 determine that. So when I recognized that, I have -- I
4 didn't dis-involve myself, but I realized that that was
5 the vehicle that -- that's the vehicle that was going to
6 be used, to be dealt with, in early 1996.

7 Q. Okay. So when you were trying to establish a
8 budget for 1996, did you have a separate entry for resale
9 to determine how much funds would have to be devoted to
10 the resale effort?

11 A. That was managed through the Lesley Wood and
12 local competition process, not --

13 Q. So do I understand correctly then that you
14 essentially received sort of an estimated budget from
15 Lesley Wood's group and just plugged that into your own

16 budget?

17 A. No.

18 Q. How did it work?

19 A. The way in which -- and I am going, again, from
20 a little bit of memory, if that's okay.

21 Q. Sure, just your best recollection.

22 A. My best recollection -- so you had the local
23 competition team, and they, through Lesley Wood, they were
24 working to create the estimates based on their

25 expectations, and I don't recall exactly all the numbers
0019

1 because it was a while ago. So they worked within the

2 local competition infrastructure to illustrate the

3 requirements they had for resources, and then they were --

4 the local competition infrastructure, the LIIT teams, and

5 all that were the groups that determined the resources and

6 then got the agreements, in terms of funding.

7 Q. Why don't you explain what the LIIT team -- is

8 that L-I-T-E?

9 A. Yes. I am not super-familiar with that, the

10 infrastructure, because I wasn't -- me nor my team was

11 directly involved in the determination of what the

12 requirements were or that kind of -- in terms of the

13 system requirements of others.

14 Q. Do you know who was on the LIIT team?

15 A. Lesley Wood. She is one person I know that

16 directly is in the LIIT team.

17 Q. Do you know if Greg Torretta was on it?

18 A. I would be speculating. I would guess, but I'd
19 be speculating. Again, I had no dealings with them
20 directly.

21 Q. But you were responsible for setting an overall
22 budget for the industry markets group, correct?

23 A. That's correct.

24 Q. And at some point, there was a budget prepared
25 that included some allocation of resources for resale of
0020
1 business?

2 A. Yes.

3 Q. And did you have any involvement in determining
4 what that figure should be?

5 A. We were a recipient, so not -- at that point,
6 not directly involved.

7 Q. So you were a recipient of an estimate as to
8 what -- how much resources should be devoted to the resale
9 effort for setting the 1996 budget; is that right?

10 A. Again, just to kind of go back and talk about
11 it, the process is that the local competition
12 implementation team was the one that was the organization
13 that was facilitating, at that time, the resource
14 requirements, to pay for whatever the estimates were, and
15 so it was held separate.

16 Q. So it was something that was outside your
17 control?

18 A. That's correct.

19 Q. And what was the local competition team, was
20 that something outside industry markets?